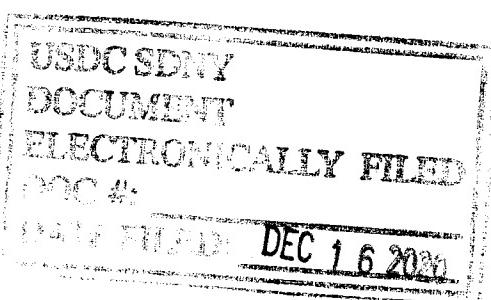


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December 4, 2020

Via ECF

Hon. George B. Daniels
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.

Dated: DEC 16 2020

Re: *Unión Fenosa Gas, S.A. v. Arab Republic of Egypt, The Bank of New York Mellon Corporation, and The Bank of New York Mellon SA/NV, Luxembourg Branch*, Case No. 1:20-cv-09160-GBD

Dear Judge Daniels:

We represent Plaintiff Unión Fenosa Gas, S.A. ("UFG") in the above-captioned action.

On December 1, 2020, UFG, together with certain other companies and Defendant the Arab Republic of Egypt ("Egypt") executed a settlement agreement (the "Settlement Agreement"). Provided that the parties satisfy certain settlement conditions by March 14, 2021 (the "Long Stop Date"), the Settlement Agreement will resolve all disputes between UFG and Egypt relating to the enforcement of an arbitral award issued in favor of UFG and against Egypt on August 31, 2018 (the "Award"), including the above-captioned action.

The Settlement Agreement obligates UFG to suspend all proceedings related to the enforcement of the Award (including the above-captioned action) until the Long Stop Date. If the parties satisfy the settlement conditions by the Long Stop Date, UFG will be obligated under the Settlement Agreement to file a notice of dismissal in this action.

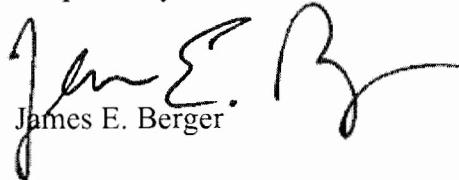
Accordingly, UFG respectfully requests that this Court stay this action until March 14, 2021, the Long Stop Date under the Settlement Agreement. UFG further requests that the

December 4, 2020

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Defendant The Bank of New York Mellon Corporation's time to answer the Complaint be tolled during the period of the stay.

Respectfully submitted,


James E. Berger

cc: All counsel of record (via ECF)